

PORTALE | RANDAZZO

October 29, 2024

Hon. Cathy Seibel
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601
Via ECF

Pretrial Services shall release Mr. Wheeler's passport to his counsel.

SO ORDERED.

Cathy Seibel
CATHY SEIBEL, U.S.D.J.

10/29/24

Re: United States v. Gary Wheeler; Case No. 23-cr-00662 (CS)

Dear Judge Seibel:

On January 5, 2024, Mr. Wheeler pled guilty to one count of 18 U.S.C. § 371, Conspiracy to Commit Wire Fraud. On July 23, 2024, This Honorable Court sentenced Mr. Wheeler to sixteen months in prison, three years of supervised release, restitution, and forfeiture of funds. (ECF 124).

Mr. Wheeler surrendered to the Bureau of Prisons at FCI Fort Dix on October 23, 2024. Pretrial Services for the Southern District of New York took possession of and currently holds Mr. Wheeler's passport. We respectfully request that Your Honor issue an order directing Pretrial Services to return Mr. Wheeler's passport to our offices so that we may return it to Mr. Wheeler's family.

Thank you for your consideration of this matter.

Sincerely,

/s/ Chad Mair
Chad Mair, Esq.

cc: AUSA Derek Wikstrom (ECF)
AUSA Jared Hoffman (ECF)